## COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION



IN THE MATTER OF:

PETITION OF NPCR, INC.,	)	CASE NO. 2003-00143
D/B/A NEXTEL PARTNERS FOR	)	
DESIGNATION AS AN ELIGIBLE	)	
TELECOMMUNICATIONS CARRIER IN	)	
THE COMMONWEALTH OF KENTUCKY	)	

# NPCR, INC. D/B/A NEXTEL PARTNERS' RESPONSES TO INFORMATION REQUESTS MADE AT HEARING

TO: Intervenors and their attorney Lindsey Ingram, Jr., Stoll, Keenon & Park, LLP, 300 West Vine Street, Suite 2100, Lexington, KY 40507-1801:

NPCR, Inc. d/b/a Nextel Partners ("Nextel Partners") responds to the Information Requests Made at the Hearing as follows:

### **RESPONSES TO INFORMATION REQUESTS**

1. Nextel Partners was asked to provide advertising plans, by rural study area, with advertising media and budgets.

#### **RESPONSE**:

See attached Exhibit A, which identifies the advertising media by which Nextel Partners intends to reach customers in the rural study areas at issue in this case.

Exhibit B, which is appended under seal to Nextel Partners' Petition for Confidential Treatment, shows advertising budgets for the various types of advertising, broken down by what was referred to at the hearing as a "business entity." Nextel Partners does not further break down its advertising budgets or expenses.

Exhibit A and B do not include the marketing of the Nextel brand name at the national level, which is done by Nextel Communications Inc. These advertisements, which include sports

sponsorships and national television and radio ads, are a way in which Nextel Partners' services are advertised in rural telephone company areas. If someone in a rural telephone company area sees a national advertisement and orders service by calling 1-800-NEXTEL9, that will be Nextel Partners' service.

2. Nextel Partners was asked to provide more detail on the way in which Nextel Partners calculated its historical investment in its Kentucky network.

#### **RESPONSE:**

Nextel Partners estimated that it had invested \$65 million in Kentucky. This was calculated by multiplying 204 cell towers by an average cost of \$250,000 per tower, which is approximately \$50 million. Then, Nextel Partners added \$15 million, which is the cost of Nextel Partners' switch that is located in Louisville. Nextel Partners further estimates that it has invested approximately \$20 million in acquiring spectrum to serve throughout all but six counties in the state.

3. Nextel Partners was asked to provide a citation to support Mr. Peabody's statement that Lifeline support is available only for a single line in a household.

#### **RESPONSE:**

In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 97-157, ¶ 341 (rel. May 8, 1997)

In the Matter of Lifeline and Linkup, WC Docket No. 03-109, FCC 04-87, ¶ 4 (rel. April 29, 2004) (Lifeline support provides support to one principal line per household).

Dated: June 10, 2004

James Park, Jr., Esq. Keith Moorman, Esq. FROST BROWN TODD LLC 250 West Main Street Suite 2700 Lexington, KY 40507

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Email: <u>pschenkenberg@briggs.com</u>

ATTORNEYS FOR NPCR, INC. d/b/a
NEXTEL PARTNERS

By Keith Mooman & Mit Mes

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by U.S. mail on this the  $10^{th}$  day of June, 2004, to the following:

James Dean Liebman P.O. Box 478 Frankfort, KY 40602 (without confidential Exhibit B)

Joan Coleman
BellSouth Telecommunications, Inc.
601 West Chestnut Street
Room 410
Louisville, KY 40232
(without confidential Exhibit B)

Stephen R. Byars
Alltel Kentucky, Inc.
Kentucky Alltel, Inc.
P.O. Box 1650
Lexington, KY 40588-1650
(without confidential Exhibit B)

Lindsey W. Ingram, Jr.
Stoll, Keenon & Park, LLP
300 West Vine Street
Suite 2100
Lexington, KY 40507-1801
(with confidential Exhibit B)

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Susan J. Mohler

		arket arket arket arket arket arket		Nashville Nashville Nashville Nashville Nashville Nashville	Logan, KY Logan, KY Logan, KY Logan, KY Monroe, KY Monroe, KY Monroe, KY	Logan Telco Logan Telco Logan Telco South Central Rural South Central Rural South Central Rural Rural	AUBURN LEWISBURG SOUTH UNION FOUNTAIN RUN GAMALIEL MOUNT HERMON	42206 42256 42283 42133 42140 42157
WAMZ-FM, V	Louisville Courrier Journal	Nwpr, Magazine Nwpr, Radio, Magazine Market	<u>.</u>	Louisville	Larue, KY	South Central Rural Logan Telco	BUFFALO ADAIRVILLE	42716 42202
WBUL-FM	Lexington Herald-Leader		< ≺	Lexington	Wolfe, KY	Mountain Rural Telco South Central Rural	MOUNT SHERMAN	41365 42764
WBUL-FM	∟exington Herald-Leader Lexington Herald-Leader	Nwpr, Radio, Magazine		Lexington		Mountain Rural Telco	PINE RIDGE	41360
WBUL-FM		Radio,		Lexington	Wolfe, XY	Mountain Rural Telco Mountain Rural Telco	LEE CITY	41332 41342
WBCI -PM	Lexington Herald-Leader	Radio,		Lexington		Mountain Rural Telco	BETHANY	41313
WKQQ-FM	Herald-Leader Herald-Leader	Nwpr, Radio, Magazine Nwpr, Radio, Magazine		Lexington	Wolfe, XY	Mountain Rural Teico	CAMPTON	41301
WKQQ-FM	Herald-Leader	Radio,		Lexington		Peoples Rural	VINCENT	41344
WKQQ-FM	Lexington Herald-Leader Lexington Herald-Leader	Nwpr, Radio, Magazine		Lexington	Owsley, KY	Peoples Rural	ISLAND CITY	41338
•	Herald-Leader	Nwpr, Magazine		Lexington		Mountain Rural Teico	BOONEVILLE	41314
' '	Lexington Herald-Leader	Nwpr, Magazine	≺ -	Lexington		Mountain Rural Telco	WEST LIBERTY	41472
•		Nwpr Magazine		Lexington	Morgan, KY	Mountain Rural Telco	OPHIR	41459
•		Nwpr, Magazine		Lexington	Morgan, KY	Mountain Rural Telco	MALONE	41451
• •		Nwpr, Magazine		Lexington	Morgan, KY	Mountain Rural Telco	ELKFORK	41421
•	Lexington Herald-Leader Lexington Herald-Leader	Nwpr, Magazine	-≺ -	Lexington	Morgan, KY	Mountain Rural Telco	CROCKETT	41413
•	ader	Nwpr, Magazine	< ≺	Lexington	Morgan, AY	Mountain Rural Telco	CANNEL CITY	41408
WKQQ-FM		Magazine, Radio	< ≺	Lexington	Menifee, KY	Mountain Rural Telco	MIZE	41352
WKOO-FM	•	Magazine, Radio	≺ '	Lexington	Menifee, KY	Mountain Rural Telco	MEANS	40346
WKQQ-FM		Magazine, Radio	≺ -	Lexington	Menifee, KY	Mountain Rural Telco	FRENCHBURG	40322
WBUL-FM, Y	•	Nwpr, Radio, Magazine	< ~	Lexington	Menifee KY	Mountain Rurai Telco	DENNISTON	40316
WBUL-FM, V	ader	Nwpr, Radio, Magazine	: ≺	Lexington	Jackson, KY	Peoples Rural	WANETA	40486 40488
WBUI-FM	Lexington Herald-Leader	Nwpr, Radio, Magazine	≺ ·	Lexington	Jackson, KY	Peoples Rural	TYNER	40486
WBUL-FM,		Nwor Radio Magazine	≺ -	Lexington	Jackson, KY	Peoples Rural	SANDGAP	40481
WBUL-FM,		Nwpr, Radio, Magazine	< ~	Lexington	Jackson, KY	Peoples Rural	PEOPLES	40467
WBUL FM (		Nwpr, Radio, Magazine	~	Lexington	Jackson, KY	Peoples Rural	GRAY HAWK	40434
WBUL-FM,	Lexington Herald-Leader Lexington Herald-Leader	Nwpr. Radio, Magazine	≺ -	Lexington	Jackson, KY	Peoples Rural	DABOLT	40421
WKDQ-FM	Louisville Courier Journal, Owensboro KY Messen WKDQ-F	Nwpr, Radio, Magazine	< ~	K Evansville	lackson KY	Peoples Rural	ANNVILLE	40402
.WKDQ-FM	Louisville Courier Journal, Owensboro KY Messeni WKDQ-FM	Nwpr, Radio, Magazine	: ≺		-	Logan Telco	DINMOR	42324 42339
WUGG-FM,	Owensboro KY Messenger	Nwpr, Magazine	≺ -	Evansville	Hancock, KY	Lewisport Telco	LEWISPORT	42351
WDGG-FM,	Ashland Daily Independent	Nwpr. Radio, Magazine	In	Charleston-Hunt		Mountain Rural Telco	SANDY HOOK	41171
WBGN-AM,	Louisville Courier Journal	Nwpr, Radio, Magazine	į ⊃ < ≺	Bowling Green	Metcalfe, KY	Mountain Bural Talco	ISONVILLE	41149
WBGN-AM	Louisville Courier Journal	Nwpr, Radio, Magazine		Bowling Green		South Central Rural	SUMMER SHADE	42166
WBGN-AM,	Louisville Courier Journal	Nwpr, Radio, Magazine		Bowling Green	Metcalie 2	South Central Rural	KNOBLICK	42154
WBGN-AM,	Louisville Courier Journal	Nwpr, Radio, Magazine		Bowling Green		South Central Rural	FDMONTON	42129
WBGN-AM,	Louisville Courier Journal	Nwpr, Radio, Magazine	<b>⊃</b> :	Bowling Green	Hart, KY	South Central Rural	MUNFORDVILLE	42765
WBGN-AM,	Louisville Courier Journal	Nwpr, Radio, Magazine		Bowling Green	Hart X	South Central Rural	MAGNOLIA	42757
WBGN-AM,	Louisville Courier Journal	Radio,	< ≺	Bowling Green	Hart, A	South Central Rural	HORSE CAVE	42749
WBGN-AM	Louisville Courier Journal	Radio,		Bowling Green		South Central Rural	CUB RUN	42729
WBGN-AM,	Louisville Courier Journal	Nwpr. Radio Magazine		Bowling Green	Hart. 57	South Central Rural	CANMER	42722
WBGN-AM,	Bowling Green News				Hart KY	South Central Rural	BONNIEVILLE	42713
WBGN-AM		Radio,		Bowling Green	Butler, KY	Logan Telco	PROVO	42267
WBGN-AM	Bowling Green News, Louisville Courier Journal			Bowling Green	Barren, KY	South Central Rural	LUCAS	42156
WBGN-AM	Bowling Green News, Louisville Courier Journal	Nwpr, Radio, Magazine		Bowling Green	Barren, KY	South Central Rural	HISEVILLE	42152
WBGN-AM,	Bowling Green News, Louisville Courier Journal	Radio,			Barren, KY	South Central Rural	ETOILE	42131
WBGN-AM	News, Louisville	Radio,	<b>5</b> ∵≺	Bowling Green	Barren, KY	South Central Rural	CAVE CITY	42127
WAGNLAM	Bowling Green News, Louisville Courier, Journal	Nwpr, Radio, Magazine		Bowling Green		South Central Rural	AUSTIN	42123
1	Marine Dick	Type	Media C	DMA	County	SAC_Name	Name	ZIP

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